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July 30, 2020

By ECF and E-mail

Hon. Analisa Torres
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312
Torres_NYSDChambers@nysd.uscourts.gov

Re: *Branch v. State University of New York, et. al.*, No. 18 Civ. 9516 (AT) (DCF)

Dear Judge Torres:

This Office represents defendants the State University of New York and Dr. Ayman Fanous in the above-referenced matter (collectively, “Defendants”). I write to supplement Defendants’ letter of July 22, 2020 requesting, on consent, an extension of their deadline to submit a letter seeking a pre-motion conference regarding their anticipated motion for summary judgment (ECF No. 117).

As described in Defendants’ July 22 letter, pursuant to the Scheduling Order previously entered in this case (ECF No. 21), Defendants’ pre-motion letter is presently due on August 3, 2020 because Magistrate Judge Freeman issued an Order on July 20, 2020 stating that “this Court considers discovery in this action to be complete” (ECF No. 113). However, after that Order was issued, Plaintiff filed a letter asking Magistrate Judge Freeman to set a new deadline for the close of discovery (ECF No. 115). At the time Defendants filed their July 22 letter, no action had been taken on Plaintiff’s request.

Subsequently, on July 24, 2020, Magistrate Judge Freeman issued an Order directing the parties to submit a joint letter “explaining exactly what discovery still remains to be completed, and how much time is needed to complete it” (ECF No. 121). The parties submitted their letter on July 28, 2020, and jointly requested that they be given until September 25, 2020 to complete outstanding discovery, including multiple depositions that are scheduled to take place over the next several weeks, starting tomorrow (ECF No. 122).

In light of the above, Defendants request that the deadline for filing their pre-motion letter be extended to 14 days after the close of discovery on September 25, 2020 (or, in the event that Magistrate Judge Freeman establishes a different deadline for the close of discovery, within 14

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days after that deadline).

Thank you for your attention to this matter.

Respectfully submitted,

/s/ JOHANE SEVERIN
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GRANTED.


The deadline for Defendants to file their pre-motion letter is EXTENDED to 14 days after the discovery deadline set by Judge Freeman.

The case management conference scheduled for August 12, 2020, and corresponding joint letter deadline is ADJOURNED *sine die*. The Court shall set new dates following resolution of the parties' request to complete outstanding discovery, ECF No. 122.

The Clerk of Court is directed to terminate the motions at ECF Nos. 117, 118, and 123.

SO ORDERED.

Dated: August 3, 2020
New York, New York



ANALISA TORRES
United States District Judge